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Lance Shaw
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U S A

Dear Mr. Shaw:

This letter is written in response to your letter of July 29, 2003, requesting information regarding (1) your investigation of alleged noncompliance regarding the modification to the Los Esteros Critical Energy Facility (LECEF) temporary transmission line interconnection and (2) the June 16, 2003 petition for modification filed by Calpine C* Corporation (Project Owner).

We have made every effort to answer each of your 35 questions as completely as possible. If you require additional information or clarification of any response, we are pleased to provide additional information. Furthermore, we are available to meet with you personally to discuss your inquiry and this response.

The issues associated with the LECEF interconnection are complex, and it has been a challenging task to reconstruct events that occurred at a furious "real time" pace over the course of several months. In hopes of creating a better understanding of these events as they unfolded, several basic facts form the underpinning for the information presented. The Commission must clearly understand these facts and consider them in context of the times (not via hindsight) to appreciate the Project Owner's perspective on this complex matter. Some of those key facts are as follows:

- LECEF understands and agrees that the "permanent" interconnection for the LECEF facility as approved by the Commission is via two underground 115 kV transmission lines connecting to the PG&E Los Esteros substation.

- The Commission Decision certifying the LECEF authorized a "temporary" interconnection of the LECEF facility to PG&E's system via an approximately 2000 foot interconnection to the then-existing Nortech – Trimble 115 kV line.

- As part of PG&E's plans for transmissions service in the area, PG&E determined and the CPUC agreed that the then-existing Nortech - Trimble 115 kV line should be split into

two segments: (1) the Nortech – Los Esteros 115 kV line and (2) the Los Esteros – Trimble 115 kV line.

- The splitting of the Nortech – Trimble line required the first temporary tap line for the LECEF project to be substantially shortened, resulting in the second temporary tap line, which resulted from the removal of all but the first three poles in the first tap line.

- As set forth in our May 21, 2003 letter to Mr. Shaw, the Project Owner continues to maintain that the creation of the second tap line was authorized by TSE-4 when approved by the CBO, which was obtained, but that no approval by the CPM was required by the Conditions of Certification.

- Notwithstanding the fact that no CPM or Commission approval was required pursuant to TSE-4, in retrospect, the Project Owner deeply regrets any perception or concern that we had not done a better job of keeping the CPM informed of the ongoing developments.

- The Project Owner continues to hope that at least one favorable outcome of this process will be further meetings with the Staff to put into place systems and protocols to insure better and more efficient communications, even during times of fast-paced decision making.

In addition to this summary of events surrounding the second temporary interconnection for the LECEF, the answers set forth below reflect the fact that certain circumstances have changed since the Commission's initial approval of the LECEF project. Those changes include, among other things, the potential opportunity to permanently connect LECEF to the new 230 kV Silicon Valley Power (SVP) switching station adjacent to both the LECEF project site and PG&E's Los Esteros Substation.

Based on preliminary analyses and discussions with SVP, there may be system reliability and other benefits associated with having the LECEF connection to the 230 kV SVP system. (Note that this switching station is not the Northern Receiving Station (NRS) as implied in some of the July 29 data requests.) Notwithstanding these possible benefits, the Project Owner is clear about the following facts:

- LECEF, as approved by the Commission, is authorized to make its permanent interconnection via underground lines to the PG&E Los Esteros substation.

- Any proposal of a different permanent interconnection, such as a permanent interconnect to the SVP system, would require Commission approval.

We look forward to your consideration of this important matter, both to clear up any misperceptions about past actions and to chart a new course for better communication as the LECEF project moves forward. Thank you for your attention to this important matter.

Sincerely,

Robert McCaffrey
General Manager, South Bay Projects

Responses to CEC Staff's
Los Esteros Petition Information Needs

Background

Before we turn to the specific questions, we would like to discuss two of Staff's assumptions that are set forth in the "Background" to Questions 1 to 4.

First, the Commission Finding quoted in your request has not "ordered" that the permanent interconnection will be through the underground transmission lines. This Finding accurately states the Applicant's intent at the time the project was licensed. However, the Commission Decision does not contain any explicit *order* regarding the timing of construction of the permanent interconnection.

Second, the second temporary tap line was not connected "instead of" the permanent interconnection. The second temporary tap line, like the original, longer temporary transmission line, is intended to be a temporary, interim connection and will remain so until the permanent interconnection is constructed or the Commission expressly authorizes a change in the permanent interconnection.

Third, while we have responded fully to each question, we must state for the record that we do not agree with the stated premise of your investigation that the decision by Project Owner to change the temporary transmission line from a tap of the Nortech - Trimble circuit to a second temporary tap of the Nortech - Los Esteros Substation circuit is "inconsistent" with the Commission Decision for the Los Esteros Critical Energy Facility Project (Commission Decision). A petition for modification was filed on June 16, 2003 at your direction, but not because we believe that such a petition is required by law.

It is our belief that the second temporary tap line is in compliance with the Conditions of Certification set forth in the Commission Decision. While it is true that we have removed almost all of the 2000 foot temporary transmission line, the removal of this temporary transmission line was clearly contemplated by the Commission Decision and did not require a petition for modification. It is also true that on May 24, 2003, PG&E began splitting the existing Nortech-Trimble 115 kV line into two segments: the Nortech – Los Esteros 115 kV line and the Los Esteros – Trimble 115 kV line. However, these actions were approved by the California Public Utilities Commission as part of the CPCN for the Los Esteros Substation, and are not subject to the jurisdiction of the California Energy Commission.[1] The Project Owner also received prior approval of the second temporary tap line from the ISO.[2]

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[1] CPUC Decision 01-05-059, (May 14, 2001), p. 4

[2] Although TSE-4 does not require the Project Owner to submit plans for the outlet line to the CPM for review or approval, the Project Owner also informed the CPM of the plans for the alternate tap line in a telephone conference on or about May 8, 2003. On May 21, 2003, we were informed that the CPM desired that we file a Petition for Modification. We filed the Petition, as directed, on June 16, 2003.

Because this interconnection is merely a reconfiguration of the temporary outlet line previously approved by the CBO pursuant to condition TSE-4 and because this modification would substantially shorten the previously approved outlet line without adding any new towers or poles, we had assumed that the reconfiguration of the temporary outlet line would similarly require approval of the CBO pursuant to TSE-4.

Condition TSE-4 specifies the procedures for review and approval of the outlet line. TSE-4 states that the Project Owner shall not begin any increment of construction of the outlet line until plans for that increment have been approved by the CBO. The Verification clause of TSE-4 requires the Project Owner to submit to the CBO for review and approval the final design plans, specifications and calculations for equipment and systems of the outlet line and termination, including a copy of the signed and stamped statement from the responsible electrical engineer attesting compliance with the applicable LORS. The above described submittal was made to the CBO on May 23, 2003. The Project Owner reviewed the submittal with the CBO representative in detail and was informed by the CBO during the meeting that the submittal was data adequate; however, the CBO would not proceed with approval until direction was received from the Commission.

It is important to note that TSE-4 expressly delegates approval of the temporary outlet line to the CBO and not to the Commission or its CPM. TSE-4 does not require the Project Owner to submit plans for any increment of the temporary outlet lines to the CPM for approval prior to the start of construction of the outlet line; in fact, TSE-4 does not require that the plans be submitted to the CPM at all. Instead, TSE-4 requires that the Project Owner merely send the CPM a copy of the *transmittal letter* in the next Monthly Compliance Report. TSE-4 states the procedures for review and approval of the outlet line. We believe that we would have received timely CBO approval of our submittal had the Commission allowed the CBO to perform the duties specified in TSE-4.

1. How long does Calpine plan to use the Nortech-Los Esteros Substation circuit before completing the underground transmission lines connecting it to the Substation?

Answer 1: The Project Owner intends to temporarily use the Nortech-Los Esteros Substation circuit until it is able to complete the Permanent Interconnection, as explained below.

On March 24, 2003, PG&E completed a System Impact Study/Facility Study for the Alternate Interconnection ("SIS/FS") for the second temporary tap line. (Exhibit A) This SIS/FS indicated that the LECEF Phase I (rated output of 195 MW) can stay connected in the second temporary tap line configuration without causing any adverse impacts on the transmission system.

This SIS/FS also provided the Project Owner the opportunity to evaluate the economic, environmental and reliability benefits of other possible permanent interconnections for LECEF to the transmission grid. On July

18, 2003, the Project Owner signed a Letter of Intent with Silicon Valley Power ("SVP") to study interconnecting LECEF to the future SVP 230 kV transmission system. (Exhibit J) This agreement was signed so that the Project Owner and SVP, through mutual agreement, could evaluate the technical and economic feasibility of connecting LECEF directly to the SVP 230 kV transmission system.

By November 2003, the Project Owner plans to submit to the Commission a proposal to convert LECEF into a combined cycle plant ("LECEF Phase II"). This submission will address the preferred "Permanent Interconnection" for this facility. This preferred Permanent Interconnection will be (1) the underground 115 transmission lines to connect LECEF to the 115 kV bus at the PG&E Los Esteros substation, or (2) a direct connection of LECEF to the 230kV SVP transmission system.

In summary, the Project Owner plans to use the Nortech-Los Esteros 115kV circuit until the Permanent Interconnection has been considered by the Commission, authorized (if it includes any connection to the SVP system) and constructed consistent with Commission interconnection approval. The timing of construction of a Permanent Interconnection for this facility will depend upon the following:

i. A decision by the Commission whether to authorize construction of a combined cycle facility at the LECEF site. This must be determined prior to construction of the underground connection, because the ultimate size and configuration of the LECEF facility could determine the details of construction of the underground facility.

ii. A decision by the Commission on the point of Permanent Interconnection for the combined cycle facility. The Commission would be asked to consider these options:
    1. Interconnect the facility via two 115 kV underground lines to the 115 kV bus at PG&E Los Esteros substation, or
    2. Interconnect the facility using two 230 kV lines and two 115/230 kV step-up transformers to the SVP 230 kV system.

2. Give a timeline for the completion of this project.

Answer 2: The preparation of the plans and specifications for Final Engineering Approval of the currently certified project will require approximately 3 to 6 months, and preparation of these plans may begin as soon as the Applicant has received clear, final direction and authorization from the Commission regarding whether to proceed with the currently certified Permanent Interconnection or another, alternative Permanent Interconnection. The Final Engineering Approval by the CBO is estimated to take one to two months after the plans. PG&E estimates that

this project would require approximately 6 to 9 months to complete from Final Engineering Approval by the CBO.

3. What factors could affect the timeline for this project?

Answer 3: The following factors could have an impact on timeline for the project:

1. Negotiations with SVP for connection to the SVP 230 kV system, currently ongoing.
2. Date of CEC Final Approval of Phase II and the Selection of Point of Permanent Interconnection.
3. Date of final approval of engineering plans by CBO.
4. Availability and delivery of long lead-time items such as switchgear, breakers, relays, steel, etc.
5. Availability of construction personnel for performing the work.
6. Clearance window for construction and cutover.
7. Licenses and permit restrictions associated with constructions of the facility.

4. Describe the role of each entity, Calpine, PG&E, CAL-ISO, and/or others, and their involvement in the decisions, impacting the timeline(s)?

Answer 4: Once the Permanent Interconnection has been determined, the Project Owner will be responsible for preparing the necessary regulatory documents for seeking authorization for the construction of LECEF Phase II. The Commission will be responsible for granting authorization in a timely manner for construction of LECEF Phase II and the Permanent Interconnection. The Commission's decision will allow the Project Owner to request PG&E or SVP to start its procurement and scheduling activities associated with permanent interconnection, to sign the appropriate documents and to advance to PG&E and/or SVP the necessary funds. PG&E and/or SVP and the Project Owner will work closely with the ISO to identify and schedule the appropriate clearance windows for this project.

5. Why did Calpine request that PG&E study a temporary tap to the Nortech-Los Esteros Substation circuit rather than construct underground circuits to the Los Esteros Substation as ordered in the Commission's Decision?

Answer 5: The Project Owner requested that PG&E study the temporary tap to the Nortech-Los Esteros circuit rather proceed with the Permanent Interconnection immediately because Calpine preferred to construct and commission the Permanent Interconnection following the commissioning of the new substation because:

i. The Project Owner wanted PG&E to identify and resolve all of the infancy problems with Los Esteros substation prior to constructing the Permanent Interconnection.

ii. The Project Owner did not want any unnecessary trips on LECEF during testing phase of Los Esteros substation.

iii. Based on PG&E's construction schedule, the Los Esteros substation was expected to be commissioned in the heart of the summer months. Constructing the Permanent Interconnection at the time of commissioning of this substation would have meant that LECEF would have to have been off-line for almost a month during the summer months. This would have hampered the Project Owner's ability to keep this unit available and ready to operate when called upon by the California Department of Water Resources under the contract.

Hence, PG&E and the Project Owner agreed that the Project Owner would fund a study to evaluate the feasibility of allowing LECEF to temporarily connect to either one of the two new 115 kV lines after the Los Esteros Substation was commissioned. To begin this new SIS/FS, PG&E asked the Project Owner make a written request. That is why, on October 21, 2002 (Exhibit E), we requested that PG&E study a temporary tap to the Nortech-Los Esteros Substation circuit.

The new SIS/FS was undertaken to solve a temporary problem and was not undertaken "rather than [to] construct underground circuits to the Los Esteros Substation" as this question implies.

6. What were the costs of the new second temporary tap line "as built"?

Answer 6: Based on the Second Amendment to Generator Special Facilities Agreement Exhibit B, the estimated cost of the second temporary pole line and the associated protection work for the accomplishing the existing interconnection was $725,000. Although a majority of this cost was related to the protection work associated with this interconnection configuration, this protection equipment may be re-used as part of the permanent 115kV interconnection.

7. What were the cost estimates for constructing the two 115 kV underground circuits to the Los Esteros Substation which you requested, were granted authority for and were required to construct by the Commission's Decision?

Answer 7: Based on the information provided in the first Amendment of the Generator Special Facilities Agreement, the PG&E related cost estimate for the construction of two 115 kV underground circuits from LECEF switchyard to Los Esteros substation 115 kV bus is $3,275,000 (this

estimate does not include the Project Owner's related costs of approximately $500,000).[3]

8. Discuss how the electrical facilities for the underground circuits for the Northern Receiving Station and the station itself will be coordinated.

Answer 8: The easements secured for the underground circuits from LECEF to Los Esteros 115 kV bus are intended to eliminate interference with the routes of the overhead lines connecting to SVP's new 230 kV switching station. NRS is not the appropriate reference as it is a separate SVP substation that is located approximately 4 miles southwest of LECEF. In PG&E's view NRS is not associated with this project or its interconnection.

9. How will the thermal effects of the above referenced circuits, which are coming into the Northern Receiving Station and the Los Esteros Substation, in such close proximity be accommodated?

Answer 9: As the lines connecting the new SVP 230 kV switching station to the NRS are overhead lines, the close proximity of these lines with the proposed permanent underground circuits from LECEF to Los Esteros Substation would have no adverse thermal impacts on the rating of any of these facilities.

10. How will the circuits heading to the Northern Receiving Station be routed? (If these circuits are above the two 115kV double circuit lines from the Los Esteros Substation then a line drop would disable four 115kV circuits and LECEF.)

Answer 10: It is our understanding that the SVP and PG&E lines will cross each other, but because PG&E and/or SVP will own and operate these circuits, we do not have any detailed information at this time regarding how these circuits will be routed.

11. Discuss the system reliability implications of the circuit arrangement mentioned in the immediately preceding question?

Answer 11: We are not able to discuss "the system reliability implications" of any transmission line configuration that may be employed by SVP and PG&E in conjunction with SVP's project. It is our understanding that all of the transmission facilities constructed in conjunction with SVP's project would be built in accordance with G.O. 95 and other applicable standards and good utility practice.

[3] As noted in our discussion above, the Commission's Decision does not "require" the Project Owner to construct the underground circuit by a specific time or date. A Finding is a factual statement of the Applicant's intent at the time the Decision was issued, and the Applicant still intends to construct this facility. A Finding is not a Condition of Certification and a Finding has no proscriptive requirement.

In addition, the transmission system built in conjunction with NRS would be designed and constructed independent of the transmission configuration of the interconnection transmission facilities associated with LECEF.

12. If the outlet for the LECEF were two underground circuits as required in the Decision, would it be necessary to route the circuits to the Northern Receiving Station overhead?

Answer 12: No.

13. Provide a plan view including the route of the two 115 kV underground circuits from the power plant switchyard to the Los Esteros Substation.

Answer 13: Please see Exhibit D.

14. Show in the plan view, the termination(s) with breakers and disconnect switches as delineated with the "three bullets" in the Summary of The Evidence (at the beginning of the TSE section) on page 78 of the decision.

Answer 14: Please see Exhibit D.

15. When and under what set of circumstances will the remaining wood poles be removed?

Answer 15: The remaining three wood poles would be removed once the permanent interconnection of LECEF is accomplished. (Note that PG&E is making use of most of the other poles originally installed for the temporary interconnection, to facilitate the final re-configuration of transmission lines in the area. It is understood that they will remove all the poles, except for the three required by LECEF by December 2003 in accordance with an agreement with the City of San Jose.)

16. What other entities besides Calpine will be involved in the decision to remove the remaining "temporary" poles?

Answer 16: PG&E and the City of San Jose.

17. What regulatory authority now has jurisdiction over those poles?

Answer 17: The CPUC. (The City of San Jose does not have regulatory jurisdiction, but is involved in decisions regarding these poles by agreement).

18. Please provide a readable Figure 1 (from your petition to amend), perhaps a C-sized document. Indicate on that figure which poles initially permitted remain and any new poles or other facilities needed to utilize the old poles.

Answer 18: Please see Exhibit F.

19. Where is the switch located?

Answer 19: The switch has not yet been installed.

20. If it has not been installed, where will it be located?

Answer 20: The installation of the switch is desired to maximize the reliability benefits afforded by LECEF. The purpose of the switch would be to isolate LECEF and enable it to produce energy onto the grid in case of an outage that affects the portion of the Los Esteros – Nortech 115 kV line between the interconnection point and the Nortech substation. The switch would be located in a manner so as to achieve the above objective.

At this point, it is our understanding that the switch would be located on the first existing pole or a new pole located immediately to the southeast side of the interconnection point of LECEF on the Nortech – Los Esteros 115 kV line.

21. How tall will the temporary steel pole be which is used to mount the switch?

Answer 21: Based on the information provided by PG&E, the height of the new steel pole is believed to be 110 feet.

22. Describe any environmental impacts from the switch installation and any mitigation measures needed.

Answer 22: PG&E anticipates that there would be no environmental impacts associated with the installation of the switch. PG&E will, however, survey the area for species of concern prior to installing the switch. No other mitigation measures are needed.

23. Please provide engineering diagrams and control logic for the existing relay and monitoring system dedicated to over current and fault protection for the second temporary tap point to the Nortech Substation.

Answer 23: Please see Exhibit G.

24. Indicate how the fault and over current provisions of the Los Esteros Substation and the LECEF power plant switchyard are coordinated.

Answer 24: Based on the information provided by PG&E, the three-terminal line between Los Esteros, Nortech and LECEF is protected by two levels of current differential protection, which are selective by nature. Therefore, no coordination problems are anticipated.

25. Provide Documentation which substantiates that the installation and operation of the secondary temporary circuit tap will comply with CPUC General Order

95 and PG&E interconnection standards consistent with condition TSE-5. Also, provide substantiation that PG&E line crossing standards are consistent with condition TSE-5.

Answer 25: Please see Exhibit H.

26. Discuss (explain) how the second temporary tap will conform to these LORS.

Answer 26: As indicated in Exhibit H - PG&E letter dated August 7, 2003 - the "second temporary tap" is in complete compliance with G.O. 95.

27. Provide a copy of an executed Generation Facility Interconnection Agreement for the new tap connection consistent with Condition TSE-5 and Decision Appendix A).

Answer 27: Generation facilities interconnected to PG&E transmission system are required to enter into a Generation Interconnection Agreement ("GIA"), not a Generating Facilities Interconnection Agreement. Exhibit I is the copy of the executed GIA for LECEF between PG&E and the Project Owner.

28. Provide a copy of the written request made to PG&E for the Alternative Interconnection System Impact/Facilities Study.

Answer 28: Please see Exhibit A.

29. Page 1 of your petition states that "only minor relay setting changes are required at the LECEF facility for protection…"] Please justify the statements made in the Petition and clearly indicate all requirements for the second temporary interconnection.

Answer 29: The alternate temporary interconnection of LECEF to the Nortech-Los Esteros 115kV line creates a three way terminal that is protected using a line differential protection scheme. All of the requirements associated with this are stated in Exhibit A – SIS/FS for Alternative Interconnection performed by PG&E for LECEF Phase I and issued on March 24, 2003

30. Please comment on the pros and cons of rerating the line.

Answer 30: Rerating the transmission lines would allow the ISO to increase the operating rating of these lines. This in-turn increases the power carrying capacity/transfer capability of these transmission facilities and the operating capability of the area, raising the power transfer level to a point where the operators would not have to implement a mitigation action to avoid normal overloads on these facilities. The rerating of these lines would also reduce the Intrazonal Congestion on these lines

31. What are all of the elements of the pertinent information that Calpine considers to be new?

Answer 31: The following information is "new" because it became available after issuance of the Commission Decision:

-PG&E's position that the Permanent Interconnection should be commissioned immediately concurrent with commissioning of the new Los Esteros Substation. This information was first communicated to the Project Owner in September 2002.

- The SIS/FS which indicated that LECEF Phase I could remain connected to the Nortech-Los Esteros Substation Circuit without adversely impacting PG&E's system. This revised SIS/FS was completed in March 2003.

- PG&E's determination that it was necessary to transfer the temporary tap line to the Nortech-Los Esteros Substation circuit until the Permanent Interconnection is completed. -.

- The current discussions with SVP regarding possible interconnection to SVP 230 kV transmission system.

32. Why was the information not available during the siting process?

Answer 32: The LECEF siting process concluded with issuance of the Commission Decision on July 2, 2002. As indicated in Answer 31, PG&E's position regarding construction and commissioning of the Permanent Interconnection was not provided to the Project Owner until September 2002, well after conclusion of the siting process. As a result, the SIS/FS that demonstrated the feasibility of the second tap line was not completed until March 2003.

33. Is Calpine requesting that construction of two underground circuits be undertaken when (and only when) the combined-cycle portion of the project is permitted by the Energy Commission? If so, when will this occur?[4]

Answer 33: The Project Owner is not making any request at this time. We are still studying all available options and holding discussions with SVP, PG&E and CAISO. If a change in the configuration of the permanent interconnection is desirable, the Project Owner would make the appropriate filing with the CEC in conjunction with the filing for approval of Phase II of the LECEF project. Please refer to Answer 1.

[4] In the Background to Question 33, your letter states: The Decision's requirement for connecting the two 115 kV underground circuits, was *when* the Los Esteros Substation "is constructed". (emphasis added) We presume that you are referring to TSE Finding 5, which states: "The final, permanent, interconnection of the LECEF will be through two, approximately 250 feet, 115 kV single circuit underground transmission lines connecting to the Los Esteros Substation when it is constructed." This finding is a simple statement of the Applicant's intent at the time the facility was licensed. This finding is not a proscriptive requirement that the Permanent Interconnection be constructed or commissioned immediately concurrent with the commissioning of the substation.

34. Explain in detail the rationale for stating that operational reliability is improved as a result of the second "temporary" tap line?

Answer 34: The alternative temporary interconnection is approximately 1850 feet shorter in length than the original temporary interconnection. This reduction in length reduces the number of facilities composing this tap line (splices, connectors, poles, pot-heads or insulators, etc.) and reduces the exposure of these facilities to elements that cause outages of any transmission facility (such as environmental factors, equipment failure, human elements, etc). The alternative temporary interconnection is therefore statistically more reliable than the original temporary interconnection.

35. Discuss in detail whether the installation of the two underground circuits to the Los Esteros Substation would provide less, same, or more operational reliability?

Answer 35: The installation of the two 362 feet long underground 115 kV lines to interconnect LECEF directly to the 115 kV bus at Los Esteros substation would result in an interconnection that is slightly more reliable than the existing overhead tap interconnection.

The existing tap interconnection is a reliable interconnection. This is because the existing tap line is only 152 feet in length and connects to the PG&E Los Esteros – Nortech 115 kV line right outside the LECEF property line. As a result, this tap line has a very limited exposure to the outage causing elements. This results in creating an extremely reliable interconnection of LECEF to the transmission grid.

However, under the current interconnection, LECEF is exposed to the single contingency outage of the Los Esteros – Nortech 115 kV line. The Permanent Interconnection would eliminate this exposure by providing two independent sources to LECEF generation and would allow the delivery of the energy generated at that facility directly to the 115 kV bus at Los Esteros substation. This increase in reliability is slightly countered by the fact that the underground lines require more equipment than the overhead lines and hence increases the statistical probability of equipment failure.

This completes our response to your "Los Esteros Petition Information Needs."